

EXHIBIT 15

Excerpts of Deposition of Denitza Batchvarova

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

VIDEOTAPED DEPOSITION OF DENITZA BATCHVAROVA

Las Vegas, Nevada

January 25, 2017

9:11 A.M.

Reported by:
Sarah Padilla, CCR NO. 929
Job No. 48403

<p style="text-align: right;">26</p> <p>1 super stars, no.</p> <p>2 Q Do you recall if that is part of the</p> <p>3 explanation for the discrepancy between the two</p> <p>4 estimates?</p> <p>5 A I don't recall. But, I mean, there is --</p> <p>6 the announcement is done differently, so there is</p> <p>7 lines that are on this page that are not on the</p> <p>8 previous page.</p> <p>9 Q If you turn back to page 87 of the current</p> <p>10 exhibit, the presentation notes that, "Apparel</p> <p>11 sponsors have small purses pointing to the UFC tax</p> <p>12 as the main culprit." Can you tell me what that</p> <p>13 refers to?</p> <p>14 A At the time apparel companies who wanted</p> <p>15 to -- that were sponsoring athletes going into the</p> <p>16 octagon were paying an affiliation fee. And so they</p> <p>17 were -- from what we had understood at the time --</p> <p>18 and Mr. Mersch is way better suited to explain --</p> <p>19 they were pointing to that as a reason why they were</p> <p>20 paying less to the athletes.</p> <p>21 Q They, being the apparel sponsors?</p> <p>22 A Sorry?</p> <p>23 Q When you say "they," are you referring to</p> <p>24 the apparel sponsors were saying that is why they</p> <p>25 were paying less to the athletes?</p>	<p style="text-align: right;">28</p> <p>1 introducing the athlete policy, that we were taking</p> <p>2 away 100 percent of their ability to derive</p> <p>3 sponsorships. We always looked at it as we are</p> <p>4 taking a small part of their -- we did not think</p> <p>5 they were going to lose 100 percent of their</p> <p>6 sponsorship, no.</p> <p>7 Q Is it fair when we are talking about the</p> <p>8 athlete revenue that Zuffa was attempting to -- the</p> <p>9 athlete sponsorship revenue that Zuffa was</p> <p>10 attempting to replace, we are referring to the</p> <p>11 revenue that they would lose under the outfitting</p> <p>12 program?</p> <p>13 A The revenue that they were deriving</p> <p>14 walking into the octagon?</p> <p>15 Q Right.</p> <p>16 A Not necessarily the revenue that they</p> <p>17 would lose, because some of them did not lose their</p> <p>18 revenue. You know, some of them still have their</p> <p>19 side agreements with different companies and some of</p> <p>20 them still have endorsement deals outside of walking</p> <p>21 into the octagon. So we were attempting to estimate</p> <p>22 what they were deriving from walking into the</p> <p>23 octagon.</p> <p>24 Q Right. Gotcha.</p> <p>25 And did that include also fight week in</p>
<p style="text-align: right;">27</p> <p>1 A Yes.</p> <p>2 Q And the affiliation fee that is being</p> <p>3 referred to here is the UFC tax?</p> <p>4 A Yes.</p> <p>5 Q And the analysis presented in this</p> <p>6 presentation, did it assume that the fighters'</p> <p>7 current sponsorship revenue would be maintained</p> <p>8 under Project Next under the operating agreement?</p> <p>9 A Which sponsorship are you referring to?</p> <p>10 Q The outside sponsorship revenue.</p> <p>11 A This analysis essentially was attempting</p> <p>12 to -- it was assuming that we would replace it with</p> <p>13 revenue that we were distributing back to them.</p> <p>14 Q Okay.</p> <p>15 A And this -- I just want to clarify that</p> <p>16 this only refers to sponsorship revenue derived by</p> <p>17 athletes during our -- during their official events</p> <p>18 when representing UFC. So walking into the octagon,</p> <p>19 press conferences, media days is their events. We</p> <p>20 don't have and we never had and never want to have</p> <p>21 any rights to athletes outside of the octagon, what</p> <p>22 they do in the 360 days that they are not officially</p> <p>23 fighting or officially -- at official UFC events.</p> <p>24 So we always saw that we are not -- you</p> <p>25 know, we did not think that we were through</p>	<p style="text-align: right;">29</p> <p>1 general?</p> <p>2 A Yes. I mean, it includes the official</p> <p>3 events during fight week, so it includes press</p> <p>4 conference, includes media day, open workout, and</p> <p>5 weigh-ins, and the event.</p> <p>6 Q So under the athlete outfitting program,</p> <p>7 during all of those events, they could only wear the</p> <p>8 official uniform that was adopted; isn't that right?</p> <p>9 A They would have to comply with the athlete</p> <p>10 outfitting policy, which doesn't necessarily mean</p> <p>11 wearing a uniform. But outside of those events,</p> <p>12 they could do whatever they want.</p> <p>13 Q Gotcha.</p> <p>14 A During fight week.</p> <p>15 Q If you look on the bottom of the page 878,</p> <p>16 it says, "We have assumed that fighters are made</p> <p>17 whole on existing income generated. No assumption</p> <p>18 has been made on incremental revenue generated</p> <p>19 through Project Next." It says, "UFC can either</p> <p>20 retain all incremental revenue or share a percentage</p> <p>21 with the fighter. Zuffa would look to generate a</p> <p>22 meaningful profit in a second deal on Project Next."</p> <p>23 Can you explain what that means?</p> <p>24 A It -- I'm sorry. This is from 2013, so I</p> <p>25 am struggling a little. But I think that the --</p>

<p style="text-align: right;">62</p> <p>1 Q Okay. Do you know if fighters at the time 2 were being compensated under that interpretation? 3 A I believe so. There was nothing that 4 would lead me to believe we weren't compensating our 5 athletes based on our agreements with them. 6 Q Okay. So I am handing you what has been 7 marked Exhibit 101, which is Bates stamped 8 ZFL-1103001 and attachment Bates stamp ZFL-1103002. 9 (Exhibit 101 was marked.) 10 BY MR. SILVERMAN: 11 Q Let me know when you have had a chance to 12 look through it. 13 A Okay. 14 Q Did you write this e-mail in the ordinary 15 course of business? 16 A I did. 17 Q And did you draft the attachment as well? 18 A I did. 19 Q Okay. Can you describe what the 20 attachment is? 21 A It was a kind of proposal on my part, 22 obviously as part of strategy. At the time after we 23 announced the athlete outfitting policy, there was 24 kind of a lot of negative feedback and a lot of 25 noise in the market around our athletes, from our</p>	<p style="text-align: right;">64</p> <p>1 negative, I don't think that we were prepared for 2 the amount of negative feedback that came from -- 3 from the general public. I don't think that even, 4 you know -- obviously there was some athletes that 5 were extremely vocal -- negatively vocal about it. 6 But at the same time the general public did not like 7 it either. 8 So it was my -- I run strategy. My job 9 is to throw ideas out there and start conversation. 10 So this was one of those things that I throw out 11 there, "Hey, should we try to look at things long 12 term and should we try to come up with something 13 that allows us to defend ourself from what 14 potentially could be coming at us?" 15 Q So was the plan that you are proposing a 16 plan about a way to structuring fighter 17 compensation? 18 A It was really more a plan to, "Hey, should 19 we think about how we go forward with, you know, 20 structuring fighter compensation?" It is a very -- 21 to this day, fighter compensation is very -- it's 22 disjointed. I wouldn't say there is a structure 23 around it. You are dealing with individual 24 athletes. You are dealing with 180 athletes, I 25 think, currently on the roster. So every</p>
<p style="text-align: right;">63</p> <p>1 athletes as well. And so obviously it was my 2 attempt to kind of help or figure out something that 3 would allow us to as a company come up with a 4 strategy in how we want to deal with that and how we 5 want to deal with the fact that, you know, our 6 athletes are not happy, there is competition, that I 7 can go and fight anywhere else, how do we -- it was 8 my attempt to essentially get people to start 9 thinking about that in a more organized way. 10 You know, it was not an easy -- we knew 11 that the athlete outfitting policy is a tremendous 12 amount of change. That's why, if you look at all 13 the documents, we started working on it two years -- 14 two, three years prior to it actually coming into 15 place. It wasn't something that we did lightly. 16 And we always looked at it as something that was a 17 net positive for everyone involved, definitely a 18 net positive for the athletes as much as possible in 19 the short run and in the long run as well. But, you 20 know, I think that we -- so that's why there is so 21 many documents going back and forth in terms of how 22 we want to do it, what is the right way, how do we 23 make the athletes even, all of that. 24 Having said that and as much as we knew it 25 was going to be a big change and change is scary and</p>	<p style="text-align: right;">65</p> <p>1 conversation is a different conversation. 2 But, you know, athlete composition is one 3 of those items for us where it continues to grow. 4 It is not going down. It is only going up. It is 5 purposely going up, right. We are purposefully 6 making sure that we are paying athletes more. We 7 are taking care of them. We are investing more and 8 more in them. So we know it is going up. 9 So the question is let's think about it. 10 You know, let's think about it constructively, let's 11 think about there is -- athletes want more 12 guaranteed money. They don't want discretionary 13 money. All these things -- minimum compensation, 14 all these things are things that, "Why not actually 15 try to think about those a little more strategically 16 than what we are doing today?" 17 So this was my plan of, "Could we start 18 thinking about it? Could we have a group of people 19 that sits down and starts creating some kind of a 20 long term strategy to make sure we continue to be a 21 leader and we retain our athletes or retain our 22 athletes and that we do more and more for them." 23 But it didn't go anywhere. 24 Q So here when you are talking about fighter 25 compensation in this presentation, you are talking</p>

17 (Pages 62 to 65)

<p style="text-align: right;">74</p> <p>1 don't think we even got to putting together a list</p> <p>2 of, "Hey, who is coming up?" I know that Tracy Long</p> <p>3 always has a list of contracts that are expiring.</p> <p>4 So I think that is probably where it would have gone</p> <p>5 anyhow.</p> <p>6 Q Was this plan shared with Lorenzo, do you</p> <p>7 know?</p> <p>8 A I don't recall.</p> <p>9 Q Did you ever have any meetings with anyone</p> <p>10 about this plan?</p> <p>11 A Besides Nakisa who I sent this to, I don't</p> <p>12 believe it got anywhere further.</p> <p>13 Q On the second point of the review you are</p> <p>14 proposing, you said, "Building a defensive strategy.</p> <p>15 How do we prevent other MMA promotions from taking</p> <p>16 advantage of the situation?" What did you mean by</p> <p>17 that?</p> <p>18 A I mean, we are in a competitive market.</p> <p>19 There is a lot of other organizations that would</p> <p>20 love to have our athletes. So it was really just</p> <p>21 a -- it was really meant to think about how do we</p> <p>22 continue to -- you know, how do we avoid that, how</p> <p>23 do we avoid, you know, Bellator taking some of our</p> <p>24 athletes, how do we avoid World Series of Fighting</p> <p>25 coming and taking some of our athletes," so yeah.</p>	<p style="text-align: right;">76</p> <p>1 financials. And it is also the most unpredictable</p> <p>2 line item in our financials, meaning that, you know,</p> <p>3 this year alone we thought that in the beginning of</p> <p>4 the year our budget pointed to athlete costs being</p> <p>5 \$135 million. At the end of the year they were</p> <p>6 actually \$160 million that is -- close to \$160</p> <p>7 million.</p> <p>8 So that is a huge variation for a business</p> <p>9 that -- you know, it is something that I really wish</p> <p>10 I had some visibility ahead of time. Because that</p> <p>11 means, as athletes costs grow and they grow with --</p> <p>12 how do I say it -- in a way that you can't predict</p> <p>13 and you can't plan for, it impacts the rest of our</p> <p>14 business. It means that we need to cut costs</p> <p>15 elsewhere. It needs to come out of somewhere -- or</p> <p>16 we just need to plan for it.</p> <p>17 So this was one of those things where</p> <p>18 we've never had -- we actually don't -- we don't</p> <p>19 have visibility into the long term athlete costs.</p> <p>20 This one of those things where, "Hey maybe we should</p> <p>21 start thinking about some kind of strategy that</p> <p>22 allows us to plan for increases that are happening,</p> <p>23 to plan for the continued, you know, enhancements</p> <p>24 that are coming down the line." So we did not get</p> <p>25 there.</p>
<p style="text-align: right;">75</p> <p>1 Q Were you planning to, in this project,</p> <p>2 address that potential risk through a compensation</p> <p>3 plan primarily?</p> <p>4 A This was as much as my thought process got</p> <p>5 to at that point.</p> <p>6 Q Okay. So the third point you mention a</p> <p>7 compensation strategy as part of this plan that you</p> <p>8 were proposing; is that right?</p> <p>9 A Yes. Because, as I mentioned earlier,</p> <p>10 fighter compensation is going up, it has since the</p> <p>11 beginning of the company. And it just -- I think</p> <p>12 knowing that that is going to continue to do, how do</p> <p>13 we do that? How do we continue? How do we continue</p> <p>14 growing compensation? And how do we prepare for it,</p> <p>15 if you will?</p> <p>16 You know, there is so many aspects of our</p> <p>17 business that are changing all the time. So it is</p> <p>18 just one of those things where, "Hey, we should</p> <p>19 probably think about do we have a strategy around</p> <p>20 it?"</p> <p>21 One thing that I think -- from my</p> <p>22 perspective, one of the functions you asked me</p> <p>23 earlier, what I receive. I receive financial</p> <p>24 planning and analysis. Well, fighter costs are the</p> <p>25 biggest cost line item that we have in our</p>	<p style="text-align: right;">77</p> <p>1 Q Under project scope, the first point you</p> <p>2 wrote "Create proposals for all high priority</p> <p>3 athletes as identified last Thursday whose contracts</p> <p>4 expire within one or two bouts." Do you recall what</p> <p>5 you are referring to about "identifying high</p> <p>6 priority athletes last Thursday"?</p> <p>7 A I don't. I really don't.</p> <p>8 Q And point No. 3 says, "Review and evaluate</p> <p>9 fighter compensation and its components as a percent</p> <p>10 of total revenue historically and as projected and</p> <p>11 identify optimal target based on overall company</p> <p>12 margin." Why were you proposing to evaluate fighter</p> <p>13 compensation as a percent of total revenue?</p> <p>14 A It is that -- I mean, it is one of the</p> <p>15 ways that you could look at being able to project as</p> <p>16 to look at historical benchmarks and look at them,</p> <p>17 you know, on a going forward basis. So it is</p> <p>18 just -- it is a potential way do be able to express</p> <p>19 on a relative basis what the compensation is.</p> <p>20 Q How about that particular metric, fighter</p> <p>21 compensation as a percent of total revenue? Why</p> <p>22 were you proposing to look at that metric?</p> <p>23 A It is a revenue being all the income</p> <p>24 sources. It is a very typical way to look at any of</p> <p>25 your costs as a percent of revenue.</p>

<p style="text-align: right;">198</p> <p>1 were supplying legal advice in that answer?</p> <p>2 A I have absolutely no recollection of what</p> <p>3 my response was to John, so --</p> <p>4 Q I'm handing you what has been marked as</p> <p>5 Exhibit 122. And it is Bates stamped ZFL-2508353</p> <p>6 and attachment ZFL-2508355.</p> <p>7 (Exhibit 122 was marked.)</p> <p>8 BY MR. SILVERMAN:</p> <p>9 Q If you look at the e-mail on top, you are</p> <p>10 CC'd on this; is that right?</p> <p>11 A Yes, I am.</p> <p>12 Q Can you tell me what the attached --</p> <p>13 who -- first let's start can you tell me who Vinci</p> <p>14 Partners are?</p> <p>15 A Vinci Partners, to the best of my</p> <p>16 understanding, is a product equity firm in Brazil.</p> <p>17 Q And do you know what the purpose of this</p> <p>18 attached presentation was?</p> <p>19 A I don't know. I am not aware of it.</p> <p>20 Q Do you know why Nakisa Bidarian CC'd you</p> <p>21 on the e-mail with this presentation attached?</p> <p>22 A When I joined the company, we were looking</p> <p>23 to create a joint venture in Brazil with a strategic</p> <p>24 partner. So that process continued for a number of</p> <p>25 months. And we ended up not moving forward with a</p>	<p style="text-align: right;">200</p> <p>1 questions. I think you are done. We are all done.</p> <p>2 MS. LYNCH: Okay. If we can just take five</p> <p>3 minutes so that I can talk to Brent and just see if</p> <p>4 we have any follow-up questions.</p> <p>5 MR. SILVERMAN: Sure.</p> <p>6 THE VIDEOGRAPHER: We are off the video</p> <p>7 record. The time is 4:05 P.M.</p> <p>8 (A short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: We are back on the video</p> <p>10 record. The time is 4:15 P.M. You may proceed.</p> <p>11 -----</p> <p style="text-align: center;">CROSS-EXAMINATION</p> <p>12 -----</p> <p>13 BY MS. LYNCH:</p> <p>14 Q Hi. This is Marcy Lynch. On the record I</p> <p>15 am just going to ask you a couple of follow-up</p> <p>16 questions. If you can turn back to Exhibit 119 that</p> <p>17 Mr. Silverman entered as an exhibit. And part of</p> <p>18 your testimony was that you believed the UFC was</p> <p>19 currently underpaid for the value you deliver to</p> <p>20 Fox; is that correct?</p> <p>21 A Yes.</p> <p>22 Q Okay. And would you also apply that same</p> <p>23 statement to the value for Pay-Per-View tickets?</p> <p>24 A From a Pay-Per-View price, our objective</p> <p>25 is always to provide value to the consumer. So when</p>
<p style="text-align: right;">199</p> <p>1 strategic partner down in Brazil. So as part of</p> <p>2 that, as soon as I joined the company, I was kept</p> <p>3 informed of the process. But I was not active in</p> <p>4 part of the process.</p> <p>5 Q Did you have any conversations with Vinci</p> <p>6 Partners or any input into this presentation?</p> <p>7 A No, I did not. I did not. I don't</p> <p>8 believe that -- I don't believe this was a</p> <p>9 presentation that I was put to verify or any</p> <p>10 collaboration with them. It seems like it was a</p> <p>11 presentation that they did develop by themselves.</p> <p>12 Q Do you know who commissioned that</p> <p>13 presentation from Vinci Partners?</p> <p>14 MS. LYNCH: Objection to form.</p> <p>15 BY MR. SILVERMAN:</p> <p>16 Q Strike that.</p> <p>17 Did Zuffa -- do you know if Zuffa</p> <p>18 commissioned this report from the Vinci Partners?</p> <p>19 A I'm not aware if we commissioned it.</p> <p>20 Q Do you know who else was working on this</p> <p>21 potential private equity deal in Brazil?</p> <p>22 A It really was Lorenzo Fertita, John</p> <p>23 Mulkey, Lawrence Epstein, Kirk Hendrick, Marshall</p> <p>24 Zelaznik, Nakisa Bidarian, and Joe Carr.</p> <p>25 MR. SILVERMAN: Okay. I think that is all my</p>	<p style="text-align: right;">201</p> <p>1 we think about the next Pay-Per-View event and fight</p> <p>2 card for that event, we always think of it as, "Are</p> <p>3 we providing enough value for the \$60 that consumers</p> <p>4 are going to pay for it?" So when we think of a</p> <p>5 fight card, we think of it always as -- you know,</p> <p>6 "Is this a Pay-Per-View card," which essentially</p> <p>7 means is this -- "Do we believe this is providing</p> <p>8 enough value to the consumer, you know, knowing that</p> <p>9 we are asking to pay \$60 for every event?"</p> <p>10 Q Between 2008 and the date of this</p> <p>11 presentation in 2014, had the UFC raised ticket</p> <p>12 prices on Pay-Per-View events?</p> <p>13 A No, we had not raised prices. We raised</p> <p>14 Pay-Per-View prices by \$5 in 2015, which was the</p> <p>15 first time since 2008.</p> <p>16 Q What were the considerations in raising</p> <p>17 Pay-Per-View prices in 2015?</p> <p>18 A I think it was an ordinary course of</p> <p>19 business. We had kind of looked at boxing, which</p> <p>20 was the only kind of other sport which is usually</p> <p>21 consumed on a Pay-Per-View basis, which is priced at</p> <p>22 \$70. We looked at the fact that we hadn't raised</p> <p>23 the prices -- we hadn't raised the prices of</p> <p>24 Pay-Per-View for a long period of time, and</p> <p>25 essentially inflation had outpaced us significantly.</p>

<p style="text-align: right;">202</p> <p>1 And so we thought that, ordinary course of business, 2 moving Pay-Per-View by \$5 was getting back to some 3 market, if you will.</p> <p>4 Q Did you consider the value provided to 5 consumers when you raised the ticket prices in 2015?</p> <p>6 A Yeah. Absolutely. We still -- as I said, 7 we always look at a Pay-Per-View events as an event 8 in which we have to -- we have to -- there is no 9 subscription in Pay-Per-View. So for every single 10 event we are starting from buy zero. You have to 11 convince consumers to buy it.</p> <p>12 So every time, you know, if the price is 13 \$55 or \$60 or \$65, essentially, every time you put 14 out a Pay-Per-View event, we are putting the card, 15 we are putting them in a way, "Look. Our objective 16 is for people to say this is worth buying." And 17 they are factoring that in when they are saying, "I 18 am going to pay \$60 for this card. Is this worth 19 paying 60?"</p> <p>20 And I think that if, you know, you look at 21 some of the, you know, the bloggers or the kind of 22 feedback, it is very common for people to say, "This 23 is not worth \$60," or "This is well worth the \$60." 24 So our objective always is in how we build the fight 25 cards. And something that Dana -- you can probably</p>	<p style="text-align: right;">204</p> <p>1 starting off -- all of a sudden you have a two-week 2 marketing window to convince consumers to purchase 3 the Pay-Per-View. And so what -- for us, we just 4 looked at how do we mitigate, you know, creating 5 some strategies on either bulking up the card even 6 more to allow even if a matchup falls off, it is 7 still a very good fight card, or working with some 8 athletes to kind of make sure that they are prepared 9 in case someone falls off. But essentially we are a 10 lot more active in making sure that the Pay-Per-View 11 cards were -- we had a strategy around to make sure 12 that every Pay-Per-View event was worth the extra 13 \$5. One, it was the worth the \$60, but worth even 14 more, you know, to the consumers.</p> <p>15 Q And when the UFC prices tickets for live 16 events -- and if I am using the wrong phrasing for 17 that -- when people actually physically go to watch 18 an event live, are there variations in the ticket 19 prices, or are they the same across the board?</p> <p>20 A There is much variation. Because, just 21 like the Pay-Per-View events, we sell a very 22 different product every time. Every one of our 23 events is a different product from the previous 24 event. So we would price tickets according to -- in 25 particular to the live events, we would price it</p>
<p style="text-align: right;">203</p> <p>1 talk to him about is that we are always building it 2 to provide value to the consumer. That is always 3 our objective. And when various prices, it just 4 raises the stakes that much more.</p> <p>5 Q And did Zuffa see a decrease in 6 Pay-Per-View buys in 2014?</p> <p>7 A 2014 was the worst year for us -- well, 8 not the worst year. It was -- in our modern 9 history, it was the worst year in Pay-Per-View 10 purchases for events. It was driven by a number of 11 factors.</p> <p>12 Q What did the UFC seek to do in 2015 to 13 potentially improve on the 2014 Pay-Per-View buys?</p> <p>14 A We looked to come up with a strategy to 15 mitigate fighters falling off of Pay-Per-View 16 events. That was one of the biggest issues is that, 17 I want to say, in 2014 out of the 13 Pay-Per-View 18 events that we had, we had eight of those the main 19 event fell off within a couple weeks from the event. 20 So that is -- from our perspective, every single 21 Pay-Per-View event, you know, we are starting from 22 zero in terms of marketing and marketing the 23 athletes and creating interest in it.</p> <p>24 So when you have athletes falling off, you 25 know, two weeks before the event, now you are</p>	<p style="text-align: right;">205</p> <p>1 according to what market we are in, what the 2 competition is in the market, who the athletes on 3 the card are, and how much interest we think there 4 will be in attending that event.</p> <p>5 Q And has the UFC been able to sell out all 6 of its events based on its ticket prices per each 7 event?</p> <p>8 A No, we are not. I mean, I would say even 9 in instances -- we always try to price ticket 10 prices -- so obviously you don't set ticket prices 11 thinking, "Okay. No one is going to come." You set 12 them with the intention that people will buy the 13 tickets and attend. But there are plenty of 14 instances where we price and realize that we've 15 priced too high, so we have to take prices down to 16 allow for a higher sell-through.</p> <p>17 I want to say, on average our sell-through 18 is possibly in the 70 percent -- 70 some percent. 19 So we are -- there is events that are sellouts, 20 obviously, that are headlined by some of the key 21 matchups and more attractive matchups. But we are 22 far from selling out every single event.</p> <p>23 Q And are there events that you believe have 24 been priced too high that have resulted in fewer 25 sell-throughs?</p>

<p style="text-align: right;">206</p> <p>1 A Yes, multiple. Both here and the Vegas 2 market, outside of the Vegas market, yes, there are. 3 Q Okay. I don't have any other questions. 4 MR. SILVERMAN: Okay. 5 THE VIDEOGRAPHER: This concludes today's 6 deposition of Denitza Batchvarova on January 25, 7 2017. The time is 4:23 P.M. We are off the video 8 record. 9 (TIME NOTED: 4:23 P.M.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">208</p> <p>1 STATE OF NEVADA) 2) ss 3 COUNTY OF CLARK) 4 5 I, Sarah Padilla, a duly commissioned and 6 licensed court reporter, Clark County, State of Nevada, 7 do hereby certify: That I reported the taking of the 8 deposition of the witness, Denitza Batchvarova, 9 commencing on Wednesday, January 25, 2017, at 9:11 A.M.; 10 That prior to being examined, the witness was, by me, 11 duly sworn to testify to the truth; That thereafter I 12 transcribed my shorthand notes into typewriting and 13 that the typewritten transcript of said deposition is a 14 complete, true, and accurate record of said shorthand 15 notes. I further certify that I am not a relative 16 or employee of any attorney or counsel of any of the 17 parties nor a relative or employee of an attorney or 18 counsel involved in said action, nor a person 19 financially interested in the action; that a request 20 [x] has [] has not been made to review the transcript. 21 IN WITNESS WHEREOF, I have hereunto set my 22 hand in the County of Clark, State of Nevada, this 14th 23 day of February. 24 25 SARAH PADILLA, CCR 929</p>
<p style="text-align: right;">207</p> <p>1 2 STATE OF _____) 3) :ss 4 COUNTY OF _____) 5 6 7 I, DENITZA BATCHVAROVA, the 8 witness herein, having read the foregoing 9 testimony of the pages of this deposition, 10 do hereby certify it to be a true and 11 correct transcript, subject to the 12 corrections, if any, shown on the attached 13 page. 14 15 16 DENITZA BATCHVAROVA 17 18 19 20 Sworn and subscribed to before 21 me, this _____ day of 22 _____, 2017. 23 24 25 Notary Public</p>	<p style="text-align: right;">209</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over carefully 4 and make any necessary corrections. You should state 5 the reason in the appropriate space on the errata 6 sheet for any corrections that are made. 7 After doing so, please sign the errata sheet 8 and date it. 9 You are signing same subject to the changes 10 you have noted on the errata sheet, which will be 11 attached to your deposition. 12 It is imperative that you return the original 13 errata sheet to the deposing attorney within thirty 14 (30) days of receipt of the deposition transcript by 15 you. If you fail to do so, the deposition transcript 16 may be deemed to be accurate and may be used in court. 17 18 19 20 21 22 23 24 25</p>

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